DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

INDIANAPOLIS

OFFICE MEMORANDUM

DATE:

June 6, 1990

TO:

Pollution Control Industries of America

Bruce Kizer PISIX THRU:

RCRA File IND 000646943, East Chicago, Lake County

FROM:

Ted Warner $au\omega$

Compliance Monitoring Section

SUBJECT: Trip Report for the Scheduled Inspection of

March 29 and April 2, 1990

EPA Region 5 Records Ctr. 318632

On March 29 and April 2, 1990, I conducted an unnanounced compliance evaluation inspection at Pollution Control Industries of America (PCIA) located at 4343 Kennedy Avenue, East Chicago, Indiana. The facility was represented by Ms. Tita Lagrimas, Environmental Coordinator. On the first day of my inspection, I was also accompanied by Ms. Syamala Chari and Ms. Laura Lightbody, both of our Engineering Section.

Preinspection File Audit

My preinspection file audit revealed that Pollution Control Industries of America has not been returned to compliance for violations noted in VL-10351. VL-10351 was a result of my last scheduled inspection conducted on September 20, 1989. The facility has not exceeded compliance schedules, but they are very near the deadline for the required response to this latest Violation Letter. The noted violations were for operating record and bond deficiencies.

There have been no apparent changes to the notification data or on-site equipment at PCIA. My preinspection file audit checklist contains all of PCIA's notification information.

Inspection Findings

My inspection included a complete tour of the site including the recently purchased Union Carbide Building south of the established facility. I also reviewed all the required documents and records. The audit revealed three apparent violations as follows:

- 1. Violation of 329 IAC 3-23-4(c). While inspecting the Area 3 container process and storage area, I noted and photographed inadequate aisle space between containers in rows 18 and 19. I need to point out that this area was under construction the date of our inspection, which could have affected the amount of storage space available. Class I
- 2. Violation of 329 IAC 3-16-4(b). While reviewing example waste analysis (PCIA laboratory report forms) I noted at least two manifested loads which had not been analyzed as prescribed by the PCIA waste analysis plan. Both of the following manifested loads did not have the metal parameters tested as prescribed. The plan calls for metals (lead, barium, zinc and chromium at 6,00-10,000 parts per million each).

- A. Manifest INAO413684 from Maaco Company (F003-5) Sample No. 5463.
- B. Manifest No. INAO421139 from Special Chem Products Corporation (F003) Sample No. 5436. Class I

Violation of 329 IAC 3-19-2(a)(3). During the inspection of operating records for hazardous waste on site, I noted that at least five manifested loads were on site without the corresponding manifests signed by a PCIA representative. When I questioned Ms. Lagrimas about this matter, she indicated that the waste analysis had not been completed for the five loads in question. The following is a list of manifests numbers and their date of arrival at PCIA.

- A) INAO421046 (3/27/90)
- B) 0421156 (3/28/90)

- c) 0421134 (3/28/90)
- D) 0421112 (3/28/90)
- E) 0421128 (3/28/90)

Class I

Conclusions and Recommendations

As a result of this inspection, I will refer the violation information to our Enforcement Section for their consideration.

TFW/bja

cc: Mr. John Crawford, Enforcement Section

April 24, 1990